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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

ION VIOREL IONITOIU,  
a/k/a "Ion Viorel Cardel,"  
a/k/a "Jon Snow,"  
a/k/a "Yanus,"  
a/k/a "2,"  
a/k/a "Mequbbal,"

Defendant.

----- X

CONSENT PRELIMINARY ORDER  
OF FORFEITURE/  
MONEY JUDGMENT

S2 21 Cr. 295 (AT)

WHEREAS, on or about February 2, 2022, ION VIOREL IONITOIU, a/k/a "Ion Viorel Cardel," a/k/a "Jon Snow," a/k/a "Yanus," a/k/a "2," a/k/a "Mequbbal," (the "Defendant"), among others, was charged in a two-count Superseding Indictment, S2 21 Cr. 295 (AT) (the "Indictment"), with conspiracy to commit bank fraud, in violation of Title 18, United States Code, Section 1349 (Count One); and conspiracy to commit money laundering in violation of Title 18, United States Code, Section 1956(h) (Count Two);

WHEREAS, the Indictment included a forfeiture allegation as to Count One of the Indictment, seeking forfeiture to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), of any and all property constituting, or derived from, proceeds the Defendant obtained directly or indirectly, as a result of the commission of the offense charged in Count One of the Indictment, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of the offense charged in Count One of the Indictment;

WHEREAS, on or about June 20, 2023, the Defendant pled guilty to Count One of the Indictment, pursuant to a plea agreement with the Government, wherein the Defendant admitted the forfeiture allegation with respect to Count One of the Indictment and agreed to forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), a sum of money equal to \$3,380,068 in United States currency, representing the amount of proceeds traceable to the commission of the offense charged in Count One of the Indictment;

WHEREAS, the Defendant consents to the entry of a money judgment in the amount of \$3,380,068 in United States currency, representing the amount of proceeds traceable to the offense charged in Count One of the Indictment that the Defendant personally obtained, for which the Defendant is jointly and severally liable with his co-defendant Natalia Korzha, against whom a forfeiture money judgment was entered in this case on May 5, 2022; and

WHEREAS, the Defendant admits that, as a result of acts and/or omissions of the Defendant, the proceeds traceable to the offense charged in Count One of the Indictment that the Defendant personally obtained cannot be located upon the exercise of due diligence.

IT IS HEREBY STIPULATED AND AGREED, by and between the United States of America, by its attorney Damian Williams, United States Attorney, Assistant United States Attorney Sarah Lai, of counsel, and the Defendant, and his counsel, Joseph DiBenedetto, Esq., that:

1. As a result of the offense charged in Count One of the Indictment, to which the Defendant pled guilty, a money judgment in the amount of \$3,380,068 in United States currency (the "Money Judgment"), representing the amount of proceeds traceable to the offense charged in Count One of the Indictment that the Defendant personally obtained, for which the Defendant is jointly and severally liable with his co-defendant Natalia Korzha, against whom a

forfeiture money judgment was entered in this case on May 5, 2022, shall be entered against the Defendant.

2. Pursuant to Rule 32.2(b)(4) of the Federal Rules of Criminal Procedure, this Consent Preliminary Order of Forfeiture/Money Judgment is final as to the Defendant, ION VIOREL IONTOIU, a/k/a "Ion Viorel Cardel," a/k/a "Jon Snow," a/k/a "Yanus," a/k/a "2," a/k/a "Mequbbal," and shall be deemed part of the sentence of the Defendant, and shall be included in the judgment of conviction therewith.

3. All payments on the outstanding money judgment shall be made by postal money order, bank or certified check, made payable, in this instance, to United States Customs and Border Protection, and delivered by mail to the United States Attorney's Office, Southern District of New York, Attn: Money Laundering and Transnational Criminal Enterprises Unit, One St. Andrew's Plaza, New York, New York 10007 and shall indicate the Defendant's name and case number

4. United States Customs and Border Protection or its designee shall be authorized to deposit the payment on the Money Judgment into the Treasury Assets Forfeiture Fund, and the United States shall have clear title to such forfeited property.

5. Pursuant to 21 U.S.C. § 853(p), the United States is authorized to seek forfeiture of substitute assets of the Defendant up to the uncollected amount of the Money Judgment.

6. Pursuant to Rule 32.2(b)(3) of the Federal Rules of Criminal Procedure, the United States Attorney's Office is authorized to conduct any discovery needed to identify, locate or dispose of forfeitable property, including depositions, interrogatories, requests for production of documents and the issuance of subpoenas.

7. The Court shall retain jurisdiction to enforce this Consent Preliminary Order of Forfeiture/Money Judgment, and to amend it as necessary, pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.


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8. The signature page of this Consent Preliminary Order of Forfeiture/Money Judgment may be executed in one or more counterparts, each of which will be deemed an original but all of which together will constitute one and the same instrument.

AGREED AND CONSENTED TO:

DAMIAN WILLIAMS  
United States Attorney for the  
Southern District of New York

By: \_\_\_\_\_

  
Sarah Lai  
Assistant United States Attorney  
One St. Andrew's Plaza  
New York, NY 10007  
(212) 637-1944

6/20/2023  
DATE


ION VIOREL IONITOIU

By: \_\_\_\_\_

  
Ion Viorel Ionitoiu

6/20/23  
DATE

By: \_\_\_\_\_

  
Joseph DiBenedetto, Esq.  
Attorney for Defendant  
The Law Office of Joseph DiBenedetto, PC  
1565 Franklin Avenue, Suite 301  
Mineola, New York 11501

6/20/23  
DATE

SO ORDERED:

  
\_\_\_\_\_  
HONORABLE ANALISA TORRES  
UNITED STATES DISTRICT JUDGE

December 13, 2023  
DATE